



Record of Modification

to the
Troy Sampling and Quality Assurance Project Plan
Field Activities

TFO - 0 0 0 1 2 (numbered by Data Manager)

1135567 - R8 SDMS

Instructions to Requester: Fax to contacts at bottom of form for review and approval.

File approved copy with Data Manager at the Troy Field Office (TFO).

Data Manager will maintain legible copies in a binder that can be accessed by TFO personnel.

If Modification is Temporary for a Single Parcel, Data Manager will scan this and place in parcel's electronic file.

Project Work Plan/QAPP (check one):

- Troy Asbestos Property Evaluation Work Plan

○ Other (Title and approval date): _____

Site-Specific Guidance/SOP (Number and Revision No.) (check one):

- CDM-LIBBY-10, Current Revision (30-point dust sample collection)
- CDM-LIBBY-05, Current Revision (30-point soil sample collection)
- CDM-LIBBY-06, Current Revision (Visible Vermiculite Estimation)

Other (Title, Number/Revision): _____

Requester: Catherine LeCours

Title: Project Manager

Company: DEQ

Date: December 22, 2008

Description of Modification (attach additional sheets if necessary; state section and page numbers of each document that are affected by the proposed modification): Eliminate the collection of dust samples pursuant to the TAPE Work Plan. Please see attached Memorandum for justification.

Field logbook and page number where Modification is documented (or attach associated correspondence):

Potential Implications of Modification: No dust samples will be collected in residences inspected in the future.

Duration of Modification (check one):

- Temporary

Date(s): _____

AD- _____

BD(s)- _____

TT(s)- _____

- Permanent (Proposed Text Modification Section) Effective Date: December 22, 2008

Proposed Text Modifications in Associated Document (attach additional sheets if necessary): None for the TAPE document, only the record of modification.

Data Quality Indicator (circle one) – Please reference definitions on reverse side for direction on selecting data quality indicators:

Not Applicable

Reject

Low Bias

Estimate

High Bias

No Bias

Technical Review and Approval: _____

(DEQ Project Manager or designate)

Date: _____

EPA Review and Approval: _____

(USEPA RPM or designate)

Date: 12-22-08

December 22, 2008

To: Victor Ketellapper, Project Team Lead
Libby Asbestos Site

From: Catherine LeCours, State Project Manager
Troy Operable Unit, Libby Asbestos Site

Subject: Collection of Dust Samples for the Troy Asbestos Property Inspections
pursuant to the TAPE Work Plan

Currently, dust samples are being collected at each commercial and residential parcel in the Troy Operable Unit pursuant to the TAPE Work Plan (Tetra Tech, July 2007). Upon review of the available dust analytical results in comparison to the other removal "triggers" identified for the site, we have concluded the dust analytical results do not contribute meaningful information from which we make clean up decisions.

Specifically, in Troy, we have identified 78 buildings (or parts of buildings) in which the field inspection teams noted visible vermiculite in interior living spaces (excluding attics). Not one of the associated dust samples were above our current trigger level of 5,000 s/cc. Conversely, we have 6 dust samples above the current trigger level with no interior visible vermiculite noted. Only two of those parcels have no other explanation to explain the presence of the vermiculite. Therefore, the lack of information provided by a dust analytical result does not justify the expense of the collection.

Please note that dust samples are no longer collected in OU 4. From the historical samples, less than three of those have been used independently for any decision making.

I am requesting that you approve TFO-00012 to discontinue the collection of dust samples effective immediately.

Thank you for your consideration and please do not hesitate to contact me if you have further questions or concerns.